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May 22, 2013

Brian Jones
Senior Campaign Finance Analyst
Report Analysis Division
Federal Election Commission
999 E Street Washington, DC 20463

Re: Citizens United Political Victory Fund, FEC ID No. C00295527

Response to your letter dated April 17, 2013 regarding the amended Post-General Report covering October 18, 2012 ? November 26, 2012.

Dear Mr. Jones:

In your letter you request further explanation regarding the increase in the amount of disbursements reported on the amended Post-General Report as compared to the initial Post-General Report.

The bulk of the increase in disbursements is reflected in two payments to InfoCision Management Corporation, one on October 29, 2012 in the amount of \$8,601.95 and the other on November 13, 2012, in the amount of \$9,016.67. As reflected on the amended report, both payments were for membership communications. The remainder of the increase in disbursements was for bank service charges and merchant service fees that were incurred in November 2012. Without the benefit of the November 2012 bank statement, the payments to InfoCision Management Corporation were inadvertently overlooked until after the initial Post-Election Report had been filed. (While one of the two disbursements was made at the end of October 2012, it did not clear the bank until early November 2012.) As to the other changes in disbursements, the precise amounts disbursed for bank service charges and merchant services fees relating to credit card receipts are generally not available to the committee until it receives its monthly bank statements. The committee strives to file accurate and complete reports, and bank statements are a key cross reference in the process. Unfortunately, due to the dates covered by the Post-Election Report, bank statements reflecting covered transactions that were made or cleared in November 2012 were not available until after the reporting deadline.

Please feel free to contact me if you should have any further questions regarding this matter. Thank you.

Sincerely,

Michael Boos
Citizens United Vice President
& General Counsel
